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Attorney for Defendant
 THOMAS BYNUM

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES,)	NO. CR-06-00191 WHA
)	
Plaintiff,)	
)	
v.)	
)	DECLARATION AND PROPOSED
THOMAS BYNUM,)	ORDER RE: CONDITIONS OF RELEASE
)	
Defendant.)	

DECLARATION OF COUNSEL


I, JULIANA DROUS, declare under penalty of perjury as follows:

I represent defendant THOMAS BYNUM on the above referenced case in which he is charged with and has pled guilty to a violation of 18 U.S.C. § 922(g)(1) [illegal possession of a firearm]. Mr. Bynum was granted pre-trial release by the Honorable James Larson. His pre-trial release is supervised by Pretrial Services Officer Anthony Garnados. Mr. Garnados reports that Mr. Bynum has followed all of the conditions of his pre-trial release.


Mr. Bynum's family has rented a cabin in Clearlake, in Lake County, California from July 24, through July 31, 2006 for a family vacation. One of Mr. Bynum's pre-trial release conditions is that he abide by a curfew - he is to be in his parents home from 10:00 p.m. until 6:00 a.m. Mr. Garnados has no objection to Mr. Thomas going on vacation with his family, but has asked that I obtain a court order permitting this trip because of the curfew condition. A.U.S.A. Greg Lowder has also stated that he has no objection to this request.

1 Therefore, I respectfully request that the Court sign the attached order.

2 Executed on July 12, 2006 at San Francisco, California.

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4 
5 JULIANA DROUS
6 Attorney for Defendant
7 THOMAS BYNUM

8 IT IS SO ORDERED.
9 DATED: 7/11/06

10 
11 HON. JAMES LARSON
12 Magistrate Judge

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Nandor J. Vadas
United States Magistrate Judge